UNITED STATES DISTRICT COURT FOR THE DSITRCIT OF MASSACHUSETTS

Civil Action No.4-114456-RWZ

GENERAL ELECTRIC MORTGAGE INSURANCE COMPANY,

Plaintiff,

V. CHI CHEN A/K/A/CHI CHEN HU A/K/A TRACY CHEN

RULE 7.1(A)(2) Certificate

I, Kenneth M. Levine, do certify that over the several months prior to the Plaintiff's Motion to Serve the Subpoena Duces Tecum for Deposition Upon Ching Yee M. Tsui Via International Mail, I did discuss the issue with Counsel for the Plaintiff. Further, that these issues were discussed at a hearing before Judge Haggerty of the Massachusetts Superior Court. That at no time during the several discussions have the parties been able to come to an agreement concerning the deposition of Ching Yee M. Tsui.

Ching Yee M. Tsui, By and through Counsel,

Kenneth M. Levine, BBO# 296850 Kenneth M. Levine & Associates 370 Washington Street Brookline, Massachusetts 02445 (617)-566-2700

Michael R. Levin, BBO #296160 1500 Providence Highway - Suite 37 Norwood, Massachusetts 02062 (781) 440-0785

Certificate of Service

I, Kenneth M. Levine do state that on this 3rdst day of September, 2004 I did
send the above document to counsel for the Plaintiff via fax and first class
mail.

Kenneth M. Levine